

ADMINISTRATIVE RECORD MATERIALS	PAGES
<b>I. Final Regulations</b>	
A. Treasury Decision (“TD”) 10029	14118 - 14147
B. Clearance Documents	
i. Green circulation sheet	13840
ii. Email to Deputy Chief Counsel (“DCC”) circulating Pink clearance package	13841
iii. Executive summary of final regulations circulated on Pink	13842 - 13844
iv. Pink routing slip circulated on Pink	13845
v. Plain language summary circulated on Pink	13846
vi. Regulatory Flexibility Act checklist circulated on Pink	13847 - 13848
vii. 7-point memo	13849 - 13851
viii. Email from Treasury transmitting 7-point memo	13852
ix. Sign-off from Office of Chief Counsel on Pink clearance package	13853 - 13856
x. Sign-off from Commissioner’s Office on Pink clearance package	13857 - 13858
xi. Sign-off from Office of Tax Policy on Pink clearance package	13859 - 13860
xii. Email to Treasury Inspector General for Tax Administration (“TIGTA”) transmitting signed-off TD	13861
xiii. Letter requesting expedited handling of TD	13862 - 13863
xiv. Email from Commissioner’s Office transmitting digitally signed TD	13864
xv. Digitally signed TD (by Douglas O'Donnell)	13865 - 13988
xvi. Digitally signed TD (by Aviva Aron-Dine)	13989 - 14112
xvii. Email from Treasury transmitting digitally signed TD	14113
xviii. Congressional Review Act (“CRA”) submission email	14114
xix. Email to FRL transmitting Form 14712	14115
xx. Form 14712 submitted to Internal Revenue Bulletin for TD	14116
xxi. CRA submission materials	14117 - 14178
xxii. Treasury Policy Memo	14179
xxiii. Email from Government Accountability Office acknowledging receipt of TD	24079
<b>II. Proposed Regulations</b>	
A. Notice of Proposed Rulemaking (“NPRM”)	13820 - 13837
B. Clearance Documents	
i. Green circulation sheet	13715
ii. Regulatory Information Service Center Regulatory Information Date Form	13716 - 13717
iii. Email from Treasury transmitting the 7-point memo	13718 - 13719
iv. 7-point memo attached to Treasury’s email referenced above	13720 - 13722
v. Background Information Note	13723 - 13725

<b>ADMINISTRATIVE RECORD MATERIALS</b>	<b>PAGES</b>
vi. Executive summary of proposed regulations circulated on Pink	13726 - 13727
vii. Pink circulation routing slip	13728
viii. Regulatory Flexibility Act checklist circulated on Pink	13729 - 13730
ix. Email to DCC circulating Pink clearance package	13731
x. Plain language summary	13732
xi. Sign-off from Office of Chief Counsel on Pink clearance package	13733 - 13743
xii. Sign-off from Commissioner's Office on Pink clearance package	13744 - 13745
xiii. Sign-off from Office of Tax Policy on Pink clearance package	13746 - 13747
xiv. Office of Tax Policy approval memorandum	13748
xv. Final approved NPRM	13749 - 13818
xvi. Form 14712 submitted to Internal Revenue Bulletin for NPRM	13819
xvii. Treasury Policy Memos	13838 - 13839
xviii. Treasury Policy Memo, including NPRM cite	
 <b>III. Comments, Letters, and Hearing Materials</b>	
A. Comments and Requests to Testify Received from 04/11/2023 through 06/21/2023	4293 - 5013
B. Public Hearing Materials	
i. Hearing agenda and briefing book	5014 - 5152
ii. Unofficial hearing transcript	24080 - 24136
C. Other Letter(s)	
i. Letter to IRS dated 08/13/2021	5164 - 5254
ii. Letter to IRS dated 12/06/2023	14252 - 14253
 <b>IV. United States Code and Regulations</b>	
A. United States Code	
i. Internal Revenue Code	
a. 26 U.S.C. 11	4169 - 4170
b. 26 U.S.C. 162	4171 - 4188
c. 26 U.S.C. 267	4189 - 4196
d. 26 U.S.C. 707	4197 - 4199
e. 26 U.S.C. 816	4200 - 4202
f. 26 U.S.C. 831	4203 - 4207
g. 26 U.S.C. 833	4208 - 4212
h. 26 U.S.C. 834	4213 - 4216
i. 26 U.S.C. 953	4217 - 4227
j. 26 U.S.C. 1297	4228 - 4232
k. 26 U.S.C. 1461	4233
l. 26 U.S.C. 2701	4234 - 4242
m. 26 U.S.C. 2704	4243 - 4245

ADMINISTRATIVE RECORD MATERIALS	PAGES
n. 26 U.S.C. 6001	4246
o. 26 U.S.C. 6011	4247 - 4250
p. 26 U.S.C. 6111	4251 - 4252
q. 26 U.S.C. 6112	4253 - 4254
r. 26 U.S.C. 6501	4255 - 4263
s. 26 U.S.C. 6662	4264 - 4271
t. 26 U.S.C. 6662A	4272 - 4274
u. 26 U.S.C. 6707	4275 - 4276
v. 26 U.S.C. 6707A	4277 - 4279
w. 26 U.S.C. 6708	4280
x. 26 U.S.C. 7805	4281 - 4283
ii. Other Federal Statutes	
a. 5 U.S.C. 551	4075 - 4079
b. 5 U.S.C. 552	4080 - 4110
c. 5 U.S.C. 553	4111 - 4112
d. 5 U.S.C. 554	4113 - 4115
e. 5 U.S.C. 555	4116 - 4117
f. 5 U.S.C. 556	4118 - 4120
g. 5 U.S.C. 557	4121 - 4123
h. 5 U.S.C. 558	4124
i. 5 U.S.C. 559	4125
j. 5 U.S.C. 601	4126 - 4127
k. 5 U.S.C. 602	4128 - 4129
l. 5 U.S.C. 603	4130 - 4131
m. 5 U.S.C. 604	4132 - 4133
n. 5 U.S.C. 605	4134
o. 5 U.S.C. 606	4135
p. 5 U.S.C. 607	4136
q. 5 U.S.C. 608	4137
r. 5 U.S.C. 609	4138 - 4140
s. 5 U.S.C. 610	4141 - 4142
t. 5 U.S.C. 611	4143 - 4144
u. 5 U.S.C. 612	4145
v. 5 U.S.C. 706	4146 - 4147
w. 5 U.S.C. 801	4148 - 4152
x. 5 U.S.C. 802	4153 - 4155
y. 5 U.S.C. 803	4156
z. 5 U.S.C. 804	4157 - 4158
aa. 5 U.S.C. 805	4159
bb. 5 U.S.C. 806	4160
cc. 5 U.S.C. 807	4161
dd. 5 U.S.C. 808	4162
ee. 15 U.S.C. 1011	4163
ff. 15 U.S.C. 1012	4164
gg. 15 U.S.C. 1013	4165 - 4166

<b>ADMINISTRATIVE RECORD MATERIALS</b>	<b>PAGES</b>
hh. 15 U.S.C. 1014	4167
ii. 15 U.S.C. 1015	4168
jj. 42 U.S.C. 300gg-18	4284 - 4283
kk. 44 U.S.C. 3507	4287 - 4292
<b>B. Regulations</b>	
i. 5 C.F.R. 1320.3	943 - 948
ii. 26 C.F.R. 1.162-1	949 - 950
iii. 26 C.F.R. 1.6011-1	951 - 952
iv. 26 C.F.R. 1.6011-4	953 - 962
v. 26 C.F.R. 301.6011-1	963 - 965
vi. 26 C.F.R. 301.6111-3	966 - 974
vii. 26 C.F.R. 301.6112-1	975 - 981
viii. 26 C.F.R. 301.6707-1	982 - 989
ix. 26 C.F.R. 301.6707A-1	990 - 1002
x. 26 C.F.R. 301.6708-1	1003 - 1015
<b>C. Other Regulatory Materials</b>	
i. 87 Fed. Reg. 75185 (NPRM)	9815 - 9826
ii. 89 Fed. Reg. 81341 (Final Rule)	9827 - 9844
iii. 75 Fed. Reg. 55699	5153 - 5163
iv. Treasury Decisions	13148 - 13167
<b>V. Legislative History</b>	
A. Section 501 (1954 Code)	5349 - 5351
B. Subchapter L (1954 Code)	5582 - 5594
C. Code Section 831 - BNA Legislative History - 1988	5626 - 5636
D. Code Section 831 - BNA Legislative History - 2015	5637 - 5652
E. Code section 831(b) - BNA Legislative History - 1986	5653 - 5669
F. Code Section 831(b) - Legislative History for Public Law 108-218, 2004	5670 - 5693
G. Code Section 831(b) - Legislative History for Public Law 115-97, 2017	5694 - 5707
H. Code Section 831(b) - Legislative History for Public Law 115-141, 2018	5708 - 5730
I. H.R. Rep. No. 69-1, at 9	3122 - 3179
J. H.R. Rep. No. 99-426, at 678	3180 - 3181
K. H.R. Rep. No. 100-795, at 121	3182 - 3183
L. H.R. Rep. No. 108-548, at 261	3184 - 3593
M. Joint Committee on Taxation (“JCT”) Senate markup - original Protecting Americans from Tax Hikes (“PATH”) Act proposal	3594 - 3600
N. JCT Summary PATH Act	3601 - 3868
O. S. Rep. No. 100-445, at 127	3869 - 3870
P. Pub. Law No. 63-217 (Revenue Act of 1914)	1089 - 1108
Q. Pub. Law No. 99-514 (Tax Reform Act of 1986)	1109 - 1987
R. Pub. Law No. 108-357 (American Jobs Creation Act of 2004)	1988 - 2231

<b>ADMINISTRATIVE RECORD MATERIALS</b>	<b>PAGES</b>
S. Pub. Law No. 114-113 (PATH Act)	2232 - 3119
T. S. 1346 (113th Cong. - Companion to PATH ACT 831(b) amendment)	3120 - 3121
U. Section 1260 BlueBook tax legislation in 106th Congress	13432 - 13435
V. Section 1260 House Conference Report 106-478	13436 - 13439
W. Section 1260 Senate Report 106-201	13440 - 13443

## **VI. Subregulatory Guidance**

A. Notice 2002-70	3871 - 3873
B. Notice 2004-65	3874 - 3875
C. Notice 2005-49	3876 - 3877
D. Notice 2007-83	3878 - 3883
E. Notice 2016-66	3884 - 3890
F. Notice 2017-08	3891 - 3892
G. Notice 2017-10	3893 - 3895
H. PLR 201419007	3907 - 3910
I. Rev. Proc. 2005-26	3911 - 3915
J. Rev. Proc. 2024-01	3916 - 4042
K. Rev. Rul. 60-275	4043 - 4045
L. Rev. Rul. 2001-31	4046 - 4048
M. Rev. Rul. 2002-89	4049 - 4051
N. Rev. Rul. 2002-90	4052 - 4054
O. Rev. Rul. 2002-91	4055 - 4057
P. Rev. Rul. 2005-40	4058 - 4061
Q. Rev. Rul. 2007-47	4062 - 4066
R. Rev. Rul. 2008-08	4067 - 4070
S. Rev. Rul. 2009-26	4071 - 4074
T. CCA 200628018	933 - 936
U. CCA 202026002	937 - 942

## **VII. Other Materials Relied Upon**

A. Executive Orders	
i. Executive Order 12866 (Sept. 30, 1993)	1016 - 1025
ii. Executive Order 13132 (Aug. 4, 1999)	1026 - 1030
iii. MOA to Executive Order 12866 (June 9, 2023)	1031 - 1032
B. Notice 2016-66 Administrative Record	9845 - 13101
C. Responses to Notice 2005-49 Solicitation	
i. State of Nebraska (L. Tim Wagner)	13102 - 13144
ii. Taxpayer (Kate Westover)	13145 - 13147
iii. Utah Captive - Notice 2005-49	13168 - 13396
iv. Vermont Captive Insurance (Molly Lambert)	13397 - 13418
v. Washington Advocate Group (Brenda VieheNasess)	13417 - 13431
D. Case Law	
i. Allied Fidelity Corp. v. Comm'r, 572 F.2d 1190 (7th Cir. 1977)	2 - 5

ADMINISTRATIVE RECORD MATERIALS	PAGES
ii. AMERCO, Inc. v. Comm'r, 96 T.C. 18 (1991)	6 - 23
iii. AMERCO, Inc. v. Comm'r, 979 F.2d 162 (9th Cir. 1992)	24 - 30
iv. Avrahami v. Comm'r, 149 T.C. 144 (2017)	31 - 67
v. Ax v. Comm'r, 146 T.C. 3 (2016)	68 - 81
vi. Barnett Bank of Marion County N.A. v. Nelson, 517 U.S. 25 (1996)	82 - 91
vii. Black Hills Corp. v. Comm'r, 101 T.C. 173 (1993)	92 - 100
viii. Carnation Co. v. Comm'r, 71 T.C. 400 (1978)	101 - 110
ix. Caylor v. Comm'r, T.C. Memo. 2021-30	111 - 163
x. Chapman Glen Ltd. v. Comm'r, 140 T.C. 294 (2013)	164 - 200
xi. CIC Services LLC v IRS, 539 U.S. 209 (2021)	201 - 211
xii. CIC Services LLC v. IRS, 2022 WL 2078036 (E.D. Tenn. June 2, 2022)	212 - 220
xiii. CIC Services LLC v. IRS, 592 F. Supp. 3d 677 (E.D. Tenn. 2022)	221 - 224
xiv. Clougherty Packing Co. v. Comm'r, 811 F.2d 1297 (9th Cir. 1987)	225 - 237
xv. Clougherty Packing Co. v. Comm'r, 84 T.C. 948 (1985)	238 - 248
xvi. Comm'r v. Treganowan, 183 F.2d 288 (2d Cir. 1950)	249 - 254
xvii. Green Rock, LLC v. IRS, 654 F.Supp.3d 1249 (N.D. Ala. 2023)	255 - 260
xviii. Green Valley Investors LLC v. Comm'r, 159 T.C. 80 (2022)	261 - 289
xix. Gulf Oil Corp. v. Comm'r, 89 T.C. 1010 (1987)	290 - 314
xx. Hanover Ins. Co. v. Comm'r, 65 T.C. 715 (1976)	315 - 320
xxi. Harper Grp. v. Comm'r, 96 T.C. 45 (1991)	321 - 332
xxii. Harper Grp. v. Comm'r, 979 F.2d 1341 (9th Cir. 1992)	333 - 334
xxiii. Helvering v. Le Gierse, 312 U.S. 531 (1941)	335 - 339
xxiv. Hospital Corp.of Am. v. Comm'r, T.C. Memo. 1997-482	340 - 373
xxv. Humana, Inc. v. Comm'r, 525 U.S. 299 (1999)	374 - 384
xxvi. Humana, Inc. v. Comm'r, 881 F.2d 247 (6th Cir. 1989)	385 - 395
xxvii. Indust. Life Ins. Co. v. U.S., 344 F. Supp. 870 (D.S.C. 1972)	396 - 404
xxviii. Keating v. Comm'r, T.C. Memo. 2024-2	405 - 451
xxix. Loper Bright Enterprises v. Raimondo, 603 U.S. 369 (2024)	452 - 509
xxx. Malone & Hyde, Inc. v. Comm'r, 62 F.3d 835 (6th Cir. 1995)	510 - 518
xxxi. Mann Construction Inc. v. U.S., 27 F.4th 1138 (6th Cir. 2022)	519 - 526
xxxii. Mann Construction Inc. v. U.S., 539 F.Supp.3d 745 (E.D. Mich. 2021)	527 - 542
xxxiii. Mann Construction v. U.S., 27 F.4th 1138 (6th Cir. 2022)	543 - 550
xxxiv. Modern Life & Acc. Ins. Co. v. Comm'r, 420 F.2d 36 (7th Cir. 1969)	551 - 554

<b>ADMINISTRATIVE RECORD MATERIALS</b>	<b>PAGES</b>
xxxv. Patel v. Comm'r, T.C. Memo. 2024-34	555 - 590
xxxvi. R.V.I. Guar. Co. v. Comm'r, 145 T.C. 209 (2015)	591 - 612
xxxvii. Rent-A-Center Inc. v. Comm'r, 142 T.C. 1, 13 (2014)	613 - 638
xxxviii. Reserve Mech. Corp. v. Comm'r, 34 F.4th 881 (10th Cir. 2022)	639 - 711
xxxix. Reserve Mech. Corp. v. Comm'r, T.C. Memo. 2018-86	712 - 735
xl. Royalty Mgmt. Ins. Co., Ltd. v. Comm'r, T.C. Memo. 2024-87	736 - 768
xli. Sabo v. Metropolitan Life Ins. Co., 137 F.3d 185 (3d Cir. 1998)	769 - 780
xlii. Sears Roebuck & Co. v. Comm'r, 972 F.2d 858 (7th Cir. 1992)	781 - 790
xliii. SEC v. Nat'l Sec., Inc., 393 U.S. 453 (1969)	791 - 799
xliv. Securitas Holdings, Inc. v. Comm'r, T.C. Memo. 2014-225	800 - 811
xlvi. Skidmore v. Swift & Co., 323 U.S. 134 (1944)	812 - 815
xlvi. Spring Canyon Coal Co. v. Comm'r, 43 F.2d 78 (10th Cir. 1930)	816 - 819
xlvii. Stearns-Roger Corp. v. US, 774 F.2d 414 (10th Cir. 1985)	820 - 822
xlvi. Swift v. Comm'r T.C. Memo. 2024-13	823 - 854
xlix. Syzygy v. Comm'r, T.C. Memo. 2019-34	855 - 875
1. U.S. Dep't of Treas. v. Fabe, 508 U.S. 491 (1993)	876 - 890
ii. U.S. v. Del. Dep't of Ins., 66 F.4th 114 (3d Cir. 2023)	891 - 906
iii. U.S. v. Redcorn, 528 F.3d 727 (10th Cir. 2008)	907 - 923
liii. UPS, Inc. v. Comm'r, 254 F.3d 1014 (11th Cir. 2001)	924 - 929
liv. Welch v. Helvering, 290 U.S. 111 (1933)	930 - 932
lv. Puglisi v. Comm'r, 2021 WL 7162530 (T.C. Oct. 29, 2021)	3896 - 3906
<b>E. IRS Forms</b>	
i. Form 1120-PC	1033 - 1041
ii. Instructions to Form 1120-PC	1042 - 1069
iii. Form 8886	1070 - 1071
iv. Form 8918	1072 - 1075
v. Instructions to Form 8886	1076 - 1082
vi. Instructions to Form 8918	1083 - 1088
<b>F. Congressional Research Service Materials</b>	
i. A brief intro to the National Flood Insurance Program	5595 - 5597
ii. Intro to Financial Services - Insurance	5598 - 5600
iii. Terrorism Risk Act	5601 - 5603
iv. Terrorism Risk Insurance	5604 - 5625
<b>G. National Association of Insurance Commissioners ("NAIC") Materials</b>	
i. 2013 NAIC Profitability by Line by State Report	5731 - 6123
ii. 2014 NAIC Profitability by Line by State Report	6127 - 6520
iii. 2015 NAIC Profitability by Line by State Report	6521 - 6911
iv. 2016 NAIC Profitability by Line by State Report	6912 - 7303



<b>ADMINISTRATIVE RECORD MATERIALS</b>	<b>PAGES</b>
v. 2017 NAIC Profitability by Line by State Report	7304 - 7696
vi. 2018 NAIC Profitability by Line by State Report	7697 - 8090
vii. 2019 NAIC Profitability by Line by State Report	8091 - 8484
viii. 2020 NAIC Profitability by Line by State Report	8485 - 8864
ix. 2021 NAIC Profitability by Line by State Report	8865 - 9245
x. 2022 NAIC Profitability by Line by State Report	9246 - 9814
<b>H. Other Statistical Materials, Articles, and Background Sources</b>	
i. 50 State Survey - Captive Insurance Companies	13444 - 13484
ii. 2016 National survey of CPA earning metrics	13485 - 13512
iii. 2017 First Half Property & Casualty & Title Insurance Industries Analysis Report	13513 - 13518
iv. 2018 Annual Property & Casualty & Title Insurance Industries Analysis Report	13519 - 13533
v. 2018 National MAP Survey Executive Summary	13534 - 13559
vi. 2019 Annual Property & Casualty & Title Insurance Industries Analysis Report	13560 - 13579
vii. 2020 Annual Property & Casualty & Title Insurance Industries Analysis Report	13580 - 13594
viii. 2021 Annual Property and Casualty and Title Insurance Industry Report	13595 - 13613
ix. 2021 Industry Financial Snapshots for P&C	13614 - 13618
x. 2021 National survey of CPA earning metrics	13619 - 13631
xi. 2022 Annual Property & Casualty & Title Insurance Industries Analysis Report	13632 - 13650
xii. 2023 Annual Property & Casualty & Title Insurance Industries Analysis Report	13651 - 13667
xiii. ACLI Payments from Policies	13668 - 13683
xiv. Copy of SBA Table of Size Standards (Effective Aug 19, 2019)	13684 - 13709
xv. Medical Loss Ratio Tip Sheet Final	13710 - 13714
xvi. ABA Article "Observations on Captive Insurance Companies -10 Worst and 10 Best Things"	5255 - 5268
xvii. How and Why to Setting Up Captive Insurance	5269 - 5270
xviii. Issues Paper on Regulation and Supervision of Captive Insurance Companies (Oct. 2006)	5271 - 5320
xix. NAIC Model Law 630	5321 - 5330
xx. NAIC Model Law 785	5331 - 5348
xxi. Shadow Insurance Report 2013	5352 - 5375
xxii. Special Purpose Vehicles 2013	5376 - 5429
xxiii. State Captive Laws	5430 - 5581
xxiv. AM Best Captive Review Book 2021	14180 - 14251
<b>I. Briefs and Expert Reports</b>	
i. Petitioner's opening brief as filed in TL-13705-16	14254 - 14391
ii. Petitioners' answering brief as filed in TL-286-21	14392 - 14510
iii. Respondent's opening brief as filed in TL-21206-10	14511 - 14607



ADMINISTRATIVE RECORD MATERIALS	PAGES
iv. Respondent's Expert Report as filed in TL-10703-19	14608 - 14781
v. Respondent's Expert Report as filed in TL-10703-19	14782 - 14844
vi. Respondent's Expert Report as filed in TL-10703-19	14845 - 14861
vii. Transcript of expert witness testimony in TL-10703-19	14862 - 15089
viii. Petitioner's opening brief as filed in TL-3823-19	15090 - 15212
ix. Petitioners' supplemental brief as filed in TL-24344-17	15213 - 15240
x. Respondent's answering brief as filed in TL-17594-13	15241 - 15673
xi. Respondent's answering briefs as filed in TL-17204-13	15674 - 16139
xii. Respondent's answering brief as filed in TL-11369-16	16140 - 16517
xiii. Respondent's opening brief as filed in TL-11369-16	16518 - 16945
xiv. Respondent's Expert Report as filed in TL-13705-16	16946 - 17087
xv. Government's appellee brief as filed in Case No. 18-9011	17088 - 17174
xvi. Respondent's opening brief as filed in TL-17165-19	17175 - 17380
xvii. Respondent's reply brief as filed in TL-17165-19	17381 - 17510
xviii. Respondent's answering brief as filed in TL-286-21	17511 - 17714
xix. Respondent's Expert Report as filed in TL-15066-18	17715 - 17846
xx. Respondent's Expert Report as filed in TL-15066-18	17847 - 18064
xxi. Respondent's Expert Report as filed in TL-15066-18	18065 - 18126
xxii. Petitioners' opening brief as filed in TL-15066-18	18127 - 18441
xxiii. Respondent's reply brief as filed in TL-15066-18	18442 - 18732
xxiv. Petitioner's answering brief as filed in TL-15066-18	18733 - 18921
xxv. Respondent's opening brief as filed in TL-15066-18	18922 - 19226
xxvi. Respondent's pre-trial memorandum as filed in TL-22381-18	19227 - 19273
xxvii. Respondent's answering brief as filed in TL-22381-18	19274 - 19331
xxviii. Respondent's opening brief as filed in TL-22381-18	19332 - 19436
xxix. Petitioners' opening brief as filed in TL-286-21	19437 - 19556
xxx. Respondent's answering brief as filed in TL-24344-17	19557 - 20134
xxxi. Respondent's pre-trial memorandum as filed in TL-24344-17	20135 - 20230
xxxii. Respondent's supplemental brief as filed in TL-24344-17	20231 - 20256
xxxiii. Petitioners' opening brief as filed in TL-24344-17	20257 - 20471
xxxiv. Petitioners' reply brief as filed in TL-24344-17	20472 - 20776
xxxv. Appellant's opening brief as filed in Case No. 18-9011	20777 - 20867
xxxvi. Respondent's opening brief as filed in TL-3823-19	20868 - 21103
xxxvii. Respondent's pre-trial memorandum as filed in TL-3823-19	21104 - 21179
xxxviii. Respondent's reply brief as filed in TL-27319-12	21180 - 21279
xxxix. Respondent's pre-trial memorandum as filed in TL-25669-16	21280 - 21328
xl. Petitioner's Expert Report as filed in TL-13705-16	21329 - 21561
xli. Petitioner's Expert Report as filed in TL-13705-16	21562 - 21677
xlii. Respondent's answering brief as filed in TL-13705-16	21678 - 21869
xlili. Respondent's Expert Report as filed in TL-13705-16	21870 - 22007

ADMINISTRATIVE RECORD MATERIALS	PAGES
xliv. Respondent's Expert Report Addendum as filed in TL-13705-16	22008 - 22012
xlv. Petitioner's Expert Report as filed in TL-13705-16	22013 - 22097
xlvi. Respondent's Expert Report as filed in TL-13705-16	22098 - 22146
xlvii. Respondent's opening brief as filed in TL-13705-16	22147 - 22932
xlviii. Petitioners' answering brief as filed in TL-13705-16	22933 - 23136
xlix. Respondent's pre-trial memorandum as filed in TL-13705-16	23137 - 23181
1. Petitioner's opening brief as filed in TL-13705-16	23182 - 23319
li. Respondent's Expert Report as filed in TL-13705-16	23320 - 24055
lii. Respondent's Expert Report Rebuttal as filed in TL-13705-16	24056 - 24078